465164-00



IR-4 Headquarters Center for Specialty Crop Pest Management Rutgers. The State University of New Jersey 681 US #1 South North Brunswick, NJ 08902-3390 732.932.9575 fax: 732.932.8481

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March 30, 2005

Ms. Barbara Madden Document Processing Desk (REGFEE) Office of Pesticide Programs U.S. Environmental Protection Agency Room 266A Crystal Mall No. 2 1801 Bell Street Arlington, VA 22202-4501

Dear Barbara:

Imidacloprid RE:

Admire® 2 Flowable Insecticide, EPA Registration No. 264-758

Gaucho® 550 SC Insecticide, EPA Registration No. 264-827

Gaucho® 600 SC Insecticide, EPA Registration No. 264-828

Provado® 1.6 Flowable Insecticide, EPA Registration No. 264-763

Provado® 75% Wettable Powder Insecticide, EPA Reg. No. 264-761

Provado® 70 WG Insecticide, EPA Reg. No. 264-823

 $1\hbox{-}[(6\hbox{-}Chloro\hbox{-}3\hbox{-}pyridinyl)\ methyl]\hbox{-}\textit{N-}2\hbox{-}imidazolidinimine,\ and\ its\ metabolites}$

containing the 6-chloropyridinyl moiety, all expressed as 1-[(6-chloro-3-

pyridinyl)methyl]-N-nitro-2-imidazolidinimine

New Use

Banana

IR-4 Final Report on Banana

Field trials, 5; analytical reports, 1

FEE CATEGORY: R-17

REGISTRATION FEE: \$50,000 (See IR-4 Waiver Request below)

The undersigned, Dr. Keith Dorschner, Senior Coordinator, Interregional Research Project No. 4, State Agricultural Experiment Station, Rutgers, The State University of New Jersey, North Brunswick, New Jersey 08902, on behalf of the IR-4 Project and the Agricultural Experiment Stations of Hawaii and Puerto Rico submits this petition pursuant to Section 408(e) of the Federal Food, Drug and Cosmetic Act, as amended, with respect to the pesticide chemical, Imidacloprid (40 $\overline{\mathrm{CFR}}$ 180.472).

List of Studies Submitted in Support of Proposed Tolerance for Imidacioprid:

Vol. No

Volume Title

Imidacloprid: Magnitude of the Residue on Banana 2 46516401



As per the "IR-4 Waiver Determination Under the Pesticide Registration Improvement Act" signed by OPP Director James J. Jones, the IR-4 tolerance petition for Imidacloprid in or on Banana is in the public interest. Therefore, IR-4, along with registrant Bayer Corp., is requesting a waiver of the registration services fee for the Imidacloprid on Banana petition.

IR-4 also submits the following in support of the proposed tolerance for imidacloprid:

- 1) Completed Application for Pesticide
- 2) Notice of Filing

Yours very truly,

Interregional Research Project No. 4

Petitioner

Per_

Keith Dorschner, Ph.D. Entomology Coordinator

IR-4 Project Headquarters

Rutgers, The State University of New Jersey

681 U.S. Highway No. 1 South,

North Brunswick, NJ 08902-3390

CC: Mel Tolliver (transmittal letter, Volume 1 and Volume 2)

RFC (transmittal letter, Sections B and F) $\,$

Mike Kawate (transmittal letter)

Cal DPR (transmittal letter, Volume 1 and Volume 2)